PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division
Carrier Oversight and Program Branch

RESOLUTION T-17788 September 21, 2023

RESOLUTION

Resolution T-17788 Approval of advice letters setting forth a total of \$301,754 in fines for telephone service providers that failed to meet required service quality performance standards in the Year 2022 pursuant to General Order 133-D.

SUMMARY

This Resolution summarizes and approves the advice letters of Frontier California, Frontier Citizens Telecommunications, Frontier Communications of the Southwest, Happy Valley Telephone, and Winterhaven Telephone¹ on their proposed General Order (GO) 133-D fines calculations totaling \$301,754. The fines are a consequence of substandard service quality performance in the year 2022, pursuant to the California Public Utilities Commission's (Commission's) General Order (GO) 133-D. The carriers calculated their fines by applying the prescribed method for each month they failed to meet specific minimum standards for the *Installation Interval* under Section 3.1, *Installation Commitment* under Section 3.2, *Out of Service Repair Interval* under Section 3.4, and *Answer Time* under Section 3.5. Submission of these fines for the year 2022 complies with the directions specified in Section 9.6² of GO 133-D.

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¹ Frontier California (U-1002-C) AL # 12903, Frontier Citizens Telecommunications (U-1024-C) AL # 1320, Frontier Communications of the Southwest (U-1026-C) AL # 181, Happy Valley Telephone (U-1010-C) AL # 403A, and Winterhaven Telephone (U-1021-C) AL # 292A.

² Advice Letter Tabulating Fine. The performance of any telephone corporation subject to GO 133-D that does not meet the minimum standards shall submit annually, by February 15 of the following year, a Tier II Advice Letter that shows by month each Service Quality measurement that it did not meet the minimum standards and the applicable fine.

Type of Service

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BACKGROUND OF THE GENERAL ORDER

Since 1972, the Commission has ordered public utility telephone corporations to provide service that meets minimum service quality standards set forth in the General Order 133 series.³ General Order 133-C⁴ established a minimum set of service quality standards and reporting requirements for the installation, maintenance, and operator services for local exchange telephone service in California.

In March 2011, Staff issued a report detailing substandard levels of service quality reported by carriers for 2010. In response, the Commission opened (R.)11-12-001 to review carriers' performance, to assess the relevancy and effectiveness of the GO 133-C measures, and to determine the need for penalties for substandard performance.

On August 29, 2016, the Commission issued Decision (D.) 16-08-021, which adopted the current General Order (GO) 133-D.⁵ While maintaining the service quality standards, GO 133-D expanded GO 133-C's provisions and established an automatic fine mechanism that applies to carriers who fail to meet any of the service quality standards for three consecutive months.6

GENERAL ORDER 133-D SERVICE QUALITY REPORTING STANDARDS

GO 133-D stipulates that public utility telephone corporations must meet the minimum reporting standards for the five telephone service quality measures. The five measures are as follows:

Installation Interval	Installation
Installation Commitments	Installation
Customer Trouble Reports	Maintenance
Out of Service (OOS) Repair Interval	Maintenance
Answer Time	Operator Services

Service Measure

³ See Pub. Util. Code § 2896 ("The [C]omission shall require telephone corporations to provide customer service to telecommunication customers that includes, but is not limited to,...(c) Reasonable statewide service quality standards, including but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing. ..."); see also GO 133-D, § 1.1(a).

⁴ The Commission approved GO 133-C in Decision (D).09-07-019 (July 9, 2009).

⁵ D.16-10-019 corrects minor errors in the original version of GO 133-D.

⁶ GO 133-D, § 9.1.

Each measure has an assigned Minimum Standard Reporting Level. GO 133-D requires telephone corporations to report, on a quarterly basis, their monthly performance results for each of the five service quality metrics⁷ using a standardized form developed by Commission staff (known as a "Service Quality Standards Report Card").⁸ These quarterly reports are published on the Commission's website.⁹ When a carrier's performance falls below any of the minimum standards, the carrier is deemed to be out of compliance and must report this information to the Commission.

GENERAL ORDER 133-D FINES

While GO 133-D was adopted in August 2016, GO 133-D Section 9 (Fines), became effective on January 1, 2017. Section 9 sets forth the service quality fines, which apply only to carriers of traditional voice telephone service. A carrier's performance, size, and duration of noncompliance are factors in calculating the GO 133-D fine amount. A carrier will begin incurring a fine for these service quality measures when it reaches "chronic failure status," which means a failure to meet the minimum standard for three consecutive months. A carrier in chronic failure status will be fined a specific amount, as detailed in Sections 9.3 to 9.5, for each day that it failed to meet the minimum monthly standard. These fines do not reset at the end of a calendar year, but rather are based on a carrier's continuous service quality performance from one year to the next. A carrier will continue to incur fines until after it meets the standard (s) for two consecutive months and exits chronic failure status.

Section 9.6, Advice Letter Tabulating Fine, requires a telephone corporation that fails to meet the minimum standards to calculate and report the applicable fine imposed by GO 133-D on an annual basis, stating:

The performance of any telephone corporation that does not meet the minimum standards shall submit annually, by February 15 of the following year, a Tier II Advice Letter that shows by month each

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⁷ See §§ 3.1(e), 3.2(e), 3.3(e), 3.4(e), and 3.5(e) in both GO 133-C and GO 133-D.

⁸ See GO 133-C, Rule 8 ("8. FORM The attached form is a template for reporting GO 133-C Service Quality Standards. The staff may change this form as necessary."; see also GO 133-D, Rule 10 ("10. FORM The attached form is a template for reporting GO 133-D Service Quality Standards. The staff may change this form as necessary. Additional information can be found on the Commission's website.") The form can be found at https://www.cpuc.ca.gov/General.aspx?id=1011.

⁹ See https://www.cpuc.ca.gov/General.aspx?id=1107. The Commission's Communications Division posts on its webpage all reporting carriers' Quarterly Service Quality Reports (i.e., service quality report cards) from 2010 to present.

¹⁰ GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."

¹¹ GO 133-D, § 9.1.

¹² *Ibid*.

Service Quality measurement that it did not meet the minimum standards and the applicable fine.

The advice letter shall contain detailed calculations using MS Excel spreadsheets (or a format specified by the Communications Division) with explanations of how each fine was calculated and assumptions used in the calculation. The Communications Division (CD) will prepare a resolution for the Commission annually, and if the resolution is adopted, then fines shall be payable to the California Public Utilities Commission for deposit to the California General Fund.¹³

ADVICE LETTERS

The table below lists the advice letters received for 2022 GO 133-D service quality fines. The Commission did not receive protests for any of these advice letters.

Advice Letter No.	Filed By	Utility No.	Date Filed	Proposed Fine		
12903	Frontier California	U-1002-C	2/17/2023	\$266,405		
1320	Frontier Citizens	U-1024-C	2/17/2023	\$27,666		
181	Frontier Southwest	U-1026-C	2/17/2023	\$1,308		
403A	Happy Valley	U-1010-C	3/24/2023	\$6,000		
292A	Winterhaven	U-1021-C	3/24/2023	\$375		
	TOTAL PROPOSED FINES \$301,7					

¹³ GO 133-D, § 9.6. Section 9.6 became effective January 1, 2017.

DISCUSSION

1. Scaling Factor

General Order 133-D assigns fine amounts using base values specified in Sections 9.3 to 9.5, adjusted through a formula expressing the relative size of the carrier within the California market.¹⁴

The scaling factor formula is expressed below, with results shown in the table:

(Carrier's Access Lines / Total CA Access Lines) = **Carrier's Scaling Factor** (Carrier's Scaling Factor) x (Monthly Base Fine per Measure) x (Number of Months in Chronic Failure) = **Fine**

2022 Working Lines and Scaling Factor for Carriers Paying Fines Under G.O. 133-D							
Carrier 2022 Lines Scaling Factor							
Frontier CA	406,631	11.17%					
Frontier Citizens	42,302	1.16%					
Frontier Southwest	2,741	0.08%					
Happy Valley	1,745	0.05%					
Winterhaven	516	0.01%					

2. Fines for the GO 133-D Standards

¹⁴ Annually, the Communications Division prepares a list of the total number of working telephone access lines in California from carriers subject to GO 133-D requirements. Based on carrier size relative to the number of access lines it serves at the end of June in the reporting year, a carrier receives its unique Scaling Factor, the percentage of its customers relative to all California telephone customers. The table of carriers, working lines, and the percentage of working lines served by each carrier appears as a PDF document titled *Total Number of Access Lines in California for June 2021 from Carriers Reporting Under GO 133-D* found under *Reference Information* at: june-30-2021-go-133-d-carrier-line-counts.pdf

A. Out of Service Repair Interval

The *Out of Service Repair Interval*, defined in § 3.4, measures the average interval between the time a carrier responds to out of service trouble reports and the restoration of the customer's service. A carrier measures its average interval by dividing the number of out of service repair tickets restored within 24 hours by the number of reports received. The Minimum Standard Reporting Level for the *Out of Service Repair Interval* is 90% of outages restored within 24 hours or less.

The fine structure for this standard is calculated using the following criteria.

Base Out of Service Repair Interval Fine, GO 133-D, Section 9.3							
1 or 2 Consecutive Months of Standard Not Met Standard Not Met Standard Not Met							
Fine Per Day	\$0 per day	\$25,000 per day					
Days in a Month (For all months)	30 days	30 days					
Base Fine per Month	\$0	\$750,000 per month					

Frontier CA, Frontier Citizens Telecommunications, Frontier Southwest, and Happy Valley failed to meet the *Out of Service Repair Interval* standard for the following months in 2022¹⁵.

		2022 Out of Service Repair Interval – 90% Minimum (*chronic failure status)										
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Frontier CA	90.3%	91.2%	92.1%	93.2%	90.8%	90.1%	93.3%	88.5%	84.4%	79.6%*	70.9%*	61.6%*
Frontier Citizens	91.7%	92.9%	96.2%	95.9%	91.7%	81.1%	90.8%	89.8%	78.8%	81.7%*	72.3%*	69.3%*
Frontier SW	100.0	100.0%	95.2%	100.0%	87.5%	94.4%	94.7%	88.5%	85.7%	80.0%*	81.3%*	100.0%
Happy Valley	84.6%	82.4%*	84.0%*	94.1%	92.9%	92.9%	92.9%	100.0%	94.7%	73.3%	55.6%	80.8%*

Months that fell below the minimum standard show the percentage in r

¹⁵ Months that fell below the minimum standard show the percentage in red, and months that incurred a fine are marked with an asterisk.

Frontier CA's Out of Service repair rate was below 90% from August through December, 2022. Frontier CA entered "chronic failure status" in October, 2022 and incurred fines for the months of October through December. Frontier CA's OOS proposed fine calculation in AL 12903 is accurate and was calculated as follows:

(Frontier CA Scaling Factor 0.1117 X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 3) = \$251,325

Frontier Citizens Telecommunications' Out of Service repair rate was below 90% during June, and from August through December, 2022. Frontier Citizens entered "chronic failure status" in October and incurred fines for the remainder of the year, for a total of three months. Citizens' OOS proposed fine calculation in AL 1320 is accurate and was calculated as follows:

(Frontier Citizens Scaling Factor 0.0116 X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 3) = \$26,100

Frontier Southwest's Out of Service repair rate was below 90% during May, and from August through November, 2022. Frontier Citizens entered 'chronic failure status' in October and incurred fines for the months of October and November, 2022. Frontier SW's OOS proposed fine calculation in AL 181 is accurate and was calculated as follows:

(Frontier SW Scaling Factor 0.0008 X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 2) = \$1,200

Happy Valley was in "chronic failure status" from January through March, 2022. The OOS repair rate was above 90% in April and was removed from 'chronic failure status' in June after two months above 90%. However, Happy Valley entered "chronic failure status" once again during December, 2022 after falling below 90% in October and November. Happy Valley's proposed OOS fine calculation in AL 403A is accurate and was calculated as follows:

(Happy Valley Scaling Factor 0.0005) X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 4) = \$1,500

B. Customer Trouble Reports

The *Customer Trouble Reports* standard, defined in Section 3.3, measures the number of reports a carrier receives from its customers regarding their dissatisfaction with telephone company services. The Minimum Standard Reporting Level for the *Customer Trouble Reports* measurement varies based on the number of working lines per reporting unit.

All carriers met the *Customer Trouble Reports* standard during 2022.

C. Answer Time for Trouble Reports and Billing and Non-Billing Inquiries

The *Answer Time* standard, defined in § 3.5, measures the amount of time it takes for an operator to answer the phone when customers call a business office for billing and non-billing inquiries or a repair office for trouble reports. The value is calculated as an average answer time of a sample of the answering interval of calls to business and repair offices that is representative of the reported period.

The Minimum Standard Reporting Level for *Answer Time* is 80% of calls answered by an operator within 60 seconds when speaking to a live agent, or 80% of calls answered within 60 seconds when speaking to a live agent after completing an interactive voice response or automatic response unit system.

Frontier CA, Frontier Citizens, and Frontier SW were each in "chronic failure status" for six months in 2022.

		2022 Answer Time – 80% Minimum (*chronic failure status)										
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Frontier CA	84.4%	91.6%	66.7%	71.7%	57.8%*	57.7%*	58.3%*	55.2%*	56.5%*	64.3%*	90.1%	86.5%
Frontier Citizens	84.4%	91.6%	66.7%	71.7%	57.8%*	57.7%*	58.3%*	55.2%*	56.5%*	64.3%*	90.1%	86.5%
Frontier SW	84.4%	91.6%	66.7%	71.7%	57.8%*	57.7%*	58.3%*	55.2%*	56.5%*	64.3%*	90.1%	86.5%

Frontier CA, Citizens, and Frontier SW were below the 80% minimum standard for Answer Time from March through October, 2022 and entered "chronic failure status" from May through October, 2022. The proposed fines in Frontier's advice letters are accurate and shown below.

Frontier California:

(Frontier CA Scaling Factor 0.1117) X (3-5 months Base Fine \$15,000) X (Number of Months in Chronic Failure 3) = \$5,027

(Frontier CA Scaling Factor 0.1117) X (6-8 months Base Fine \$30,000) X (Number of Months in Chronic Failure 3) = \$10,053

Answer Time fine: \$5,027 + \$10,053 = \$15,080

Frontier Citizens Telecommunications:

(Frontier Citizens Scaling Factor 0.0116) X (3-5 months Base Fine \$15,000) X (Number of Months in Chronic Failure 3) = \$522

(Frontier Citizens Scaling Factor 0.0116) X (6-8 months Base Fine \$30,000) X (Number of Months in Chronic Failure 3) = \$1,044

Answer Time fine: \$522+\$1,044=**\$1,566**

Frontier Communications of the Southwest:

(Frontier SW Scaling Factor 0.0008) X (3-5 months Base Fine \$15,000) X (Number of Months in Chronic Failure 3) = \$36

(Frontier SW Scaling Factor 0.0008) X (6-8 months Base Fine \$30,000) X (Number of Months in Chronic Failure 3) = \$72

Answer Time fine: \$522+ \$1,044= **\$108**

D. Installation Interval

The standard for *Installation Interval*, defined in § 3.1, describes the amount of time to install basic telephone service from the time a customer requests service until it is established. It measures the average number of business days between when a service order was placed

Resolution 1-17766

CD/CJ1

and when the service became operational, divided by the total number of service orders a carrier received during a reporting period. The standard applies only to GRC ILECs.

Happy Valley and Winterhaven failed to meet the Installation Interval service quality metric in 2022.

		2022 Installation Interval – 5 or fewer Business Days (*chronic failure status)										
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Happy Valley	6.3*	6.3* 2.9 3.6 3.1 6.4 5.6 6.0* 14.0* 11.5* 3.1 5.4* 7.5							7.2*			
Winterhaven	6.6	4.3	2.7	3.3	5.0	3.9	6.2	6.7	5.4*	4.3	5.2*	4.0

Happy Valley's "chronic failure status" continued from 2021 into January, 2022. Happy Valley met the standard in February, but again did not meet the Answer Time standard of 5 or fewer business days from May through September 2022 and entered "chronic failure status" for five additional months beginning in July, 2022. Happy Valley met the standard in October 2022, failed to meet it in November 2022, and met it again in December 2022. Happy Valley's fine calculations in AL 403A are accurate and calculated as follows:

(Happy Valley Scaling Factor $\underline{0.0005}$) X (Monthly Base Fine $\underline{\$750,000}$) X (Number of Months in Chronic Failure $\underline{6}$) = \$2,250

Winterhaven did not meet the minimum standard in January, 2022 and again in July, August, September, and November, 2022. Winterhaven was in "chronic failure status" during the months of September and November, 2022. Happy Valley's fine calculations in AL 292A are accurate and calculated below:

(Winterhaven Scaling Factor $\underline{0.0001}$ X (Monthly Base Fine $\underline{\$750,000}$) X (Number of Months in Chronic Failure $\underline{2}$) = \$150

E. <u>Installation Commitments</u>

The standard for *Installation Commitments*, defined in § 3.2, describes a carrier's ability to meet their commitments to fulfill customers' requests to establish basic telephone service. It measures the monthly count of commitments and the number of commitments missed. The standard applies only to GRC ILECs. Thus, it is applicable to Happy Valley, but not to

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Frontier CA. The Minimum Standard Reporting Level for *Installation Commitments* is 95% of commitments met.

Happy Valley and Winterhaven did not meet the *Installation Commitments* service quality metric in 2022.

		2022 Installation Commitment– 95% Minimum (*chronic failure status)										
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Happy Valley	75%*	86%*	100%	100%	91%	88%	90%*	92%*	90%*	90%*	100%	100%
Winterhaven	60%	100%	100%	100%	80%	90%	92%*	100%	60%*	100%	80%*	100%

Happy Valley failed to meet the standard in eight months of 2022, and was in "chronic failure status" for a total of six months. Happy Valley's proposed fines in AL 403A are accurate and calculated below:

(Happy Valley Scaling Factor 0.0005) X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 6) = \$2,250

Winterhaven failed to meet the standard in six months of 2022 and was in "chronic failure status" for a total of three months. Winterhaven's proposed fines in AL 292A are accurate and calculated below:

(Winterhaven Scaling Factor 0.0001) X (Monthly Base Fine \$750,000) X (Number of Months in Chronic Failure 3) = \$225

¹⁶ Happy Valley was not fined in May and June because it met the standard in the previous two months. A carrier exits chronic failure status after it meets the standard for two consecutive months. A carrier must fail to meet the standard for three consecutive months to be fined. No fines will be assessed for missing the first two months (G.O. 133-D, Section 9.1).

3. Total Fine Amount per Carrier

Based on the scaling factors and the number of months the two carriers failed to meet the minimum service quality standards, the total fines for these carriers' service quality performance in the Year 2022 are as follows:

Service Quality Standard	Frontier CA	Frontier Citizens	Frontier SW	Happy Valley	Winterhaven
Out of Service Repair interval	\$251,325	\$26,100	\$1,200	\$1,500	-
Answer Time	\$15,080	\$1,566	\$108	-	-
Installation Interval	-	-	-	\$2,250	\$150
Installation Commitment	-	-	-	\$2,250	\$225
Total	\$266,405	\$27,666	\$1,308	\$6,000	\$375

Within 30 days of this Resolution's adoption date, fines must be paid by a check or money order payable to the <u>California Public Utilities Commission</u>, and mailed or delivered to:

California Public Utilities Commission Fiscal Office 505 Van Ness Avenue, Room 3000 San Francisco, CA 94102

Carriers should write on the face of the check or money order:

"For deposit to the State of California General Fund, per Resolution T-17768."

SAFETY CONSIDERATIONS

Failure to meet GO 133-D service quality standards limits customers' ability to call 9-1-1 and other emergency services and restricts public safety personnel from communicating with each other during emergencies or disasters.

CONCLUSIONS

Staff recommends Commission approval of the advice letters and estimated fines filed by Frontier California, Frontier Citizens Telecommunications, Frontier Communications of the Southwest, Happy Valley Telephone, and Winterhaven Telephone for not meeting General Order 133-D minimum service quality standards and reporting requirements for the Year 2022. The total amount of GO 133-D fines for the year 2022 is \$301,754.

COMMENTS

In compliance with Public Utility Code § 311(g), the Commission emailed a letter on August 18, 2023, notifying all parties on the general service list of the availability of this Resolution for public comments at the Commission's website www.cpuc.ca.gov. This letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available on this same website.

The Commission received --- public comments on this Resolution.

FINDINGS

- 1. General Order 133-D, Section 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter showing each month's service quality measurement that it did not meet the minimum standards and the applicable fine.
- 2. Frontier California (U-1002-C) filed Advice Letter 12903 on February 17, 2023 with proposed fines totaling \$266,405 for not meeting the *Out of Service Repair Interval* and *Answer Time* service quality minimum standards in 2022.
- 3. Frontier Citizens Telecom (U-1002-C) filed Advice Letter 1320 on February 17, 2023 with proposed fines totaling \$27,666 for falling below the *Out of Service Repair Interval* and *Answer Time* minimum standards in 2022.

- 4. Frontier Communications of the Southwest (U-1002-C) filed Advice Letter 181 on February 17, 2023 with proposed fines totaling \$1,308 for falling below *Out of Service Repair Interval* and *Answer Time* minimum standards in 2022.
- 5. Happy Valley Telephone (U-1010-C) filed an advice letter 403A on March 24, 2023 with proposed fines totaling \$6,000 for falling below the *Out of Service Repair Interval, Installation Interval*, and *Installation Commitment* minimum standards in 2022.
- 6. Winterhaven Telephone (U-1021-C) filed an advice letter 292A on March 24, 2023 with proposed fines totaling \$375 for falling below the *Installation Interval*, and *Installation Commitment* minimum standards in 2022.
- 7. Staff reviewed the carriers' advice letters and accepted their respective proposed fine calculations based on the methodology defined in General Order 133-D, Section 9.
- 8. The carriers should remit their fines to the Commission within 30 days of this Resolution's adoption date. The Commission will deposit the fine payment into the California General Fund.
- 9. On August 18, 2023, the Commission emailed a draft of this Resolution to all parties in the general service list for public comments. The Commission received ____ public comments.

THEREFORE, IT IS ORDERED THAT:

- 1. The California Public Utilities Commission approves the Advice Letters from Frontier California (U-1002-C), Happy Valley Telephone (U-1010-C), and Winterhaven Telephone (U-1021-C) which calculate their respective service quality fines under General Order 133-D for the Year 2022. The carriers are required to pay fines as set forth in this Resolution.
- 2. The carriers shall pay their assessed fines to the California Public Utilities Commission as specified in their advice letters within 30 days of this Resolution's adoption date. The

California Public Utilities Commission shall deposit the fine payments into the California General Fund.

3. Fines shall be paid within 30 days from the effective date of this Resolution by a check or money order payable to the <u>California Public Utilities Commission</u>, and mailed or delivered to:

California Public Utilities Commission Fiscal Office 505 Van Ness Avenue, Room 3000 San Francisco, CA 94102

The telephone corporation should write on the face of the check or money order: "For deposit to the State of California General Fund, per Resolution T-17788."

Advice Letter No.	Filed By	Utility No.	Date Filed	Proposed Fine			
12903	Frontier California	U-1002-C	2/17/2023	\$266,405			
1320	Frontier CitizensTelecom	U-1024-C	2/17/2023	\$27,666			
181	Frontier Southwest	U-1026-C	2/17/2023	\$1,308			
403A	Happy Valley	U-1010-C	3/24/2023	\$6,000			
292A	Winterhaven	U-1021-C	3/24/2023	\$375			
	TOTAL PROPOSED FINES \$301,754						

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This Resolution is effective today.	
I certify that the foregoing Resolution was duly i conference of the Public Utilities Commission, the following Commissioners	of the State of California held on
-	Rachel Peterson
	Executive Director

Resolution T-17768